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10 UNITED STATES DISTRICT COURT  
11 EASTERN DISTRICT OF CALIFORNIA  
12 FRESNO DIVISION

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14 DONICA SANTOS,

15 Plaintiff,

16 v.

17 KILOLO KIJAKAZI,  
18 Acting Commissioner of Social Security,

19 Defendant.

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21 No. 1:22-cv-00361-EPG

22 STIPULATION AND ORDER FOR EXTENSION  
23 OF TIME TO FILE DEFENDANT'S CROSS-  
MOTION FOR SUMMARY JUDGMENT

24 (ECF No. 20).

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The parties stipulate through counsel that Defendant, the Acting Commissioner of Social Security (the "Commissioner"), shall have an extension of thirty-one (31) days to respond to Plaintiff's Motion for Summary Judgment ("Motion") (ECF No. 19), extending the date on which Defendant's response is due from February 17, 2023, to March 20, 2023. This is Defendant's first request for an extension of time in this case.

Defendant needs more time to respond to Plaintiff's Motion because the undersigned attorney for Defendant currently has eight district court briefs due during the next eight-week

1 period. In addition, upon closer review of the record, the undersigned attorney has discovered that  
2 settlement options may exist in this case. More time is needed to explore whether settlement is an  
3 option, because this determination is dictated by additional internal review. Accordingly, the  
4 Commissioner respectfully requests an extension of 31 days, until March 20, 2023, to respond to  
5 Plaintiff's Motion.

6 The attorney for Defendant sincerely apologizes for any inconvenience to the Court,  
7 Plaintiff, and opposing counsel. This request is made in good faith and is not intended to delay the  
8 proceedings in this matter.

9 Respectfully submitted,

10 DATE: February 16, 2023

*/s/ Jared Thomas Walker*  
JARED THOMAS WALKER  
Attorney for Plaintiff  
(as approved via email)

13 PHILLIP A. TALBERT  
14 United States Attorney  
15 MATHEW W. PILE  
Associate General Counsel  
Social Security Administration

16 DATE: February 16, 2023

By */s/ Elizabeth Landgraf*  
ELIZABETH LANDGRAF  
Special Assistant United States Attorney  
Attorneys for Defendant

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## **ORDER**

Based on the above stipulation (ECF No. 20), IT IS ORDERED that Defendant shall respond to Plaintiff's motion for summary judgment by no later than March 20, 2023. All other deadlines in the Court's scheduling order are extended accordingly.

IT IS SO ORDERED.

Dated: **February 17, 2023**

/s/ Eric P. Gross  
UNITED STATES MAGISTRATE JUDGE